

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

AMYRIS, INC., *et al.*,

Debtors.¹

Chapter 11

Case No. 23-11131 (TMH)

(Jointly Administered)

**LAVVAN, INC.’S WITNESS AND EXHIBIT LIST FOR HEARING SCHEDULED FOR
OCTOBER 4, 2023 AT 10:00 A.M. (ET)**

Lavvan, Inc. (“**Lavvan**”) respectfully files this witness and exhibit list (the “**Witness and Exhibit List**”) for the hearing to be held on October 4, 2023 at 10:00 a.m. (ET) (the “**Hearing**”) before the Honorable Thomas M. Horan, at the United States Bankruptcy Court for the District of Delaware, 824 N. Market Street, 3rd Floor, Wilmington, Delaware 19801.

Lavvan reserves the right to amend and/or supplement this Witness and Exhibit List at any time prior to the Hearing, to call any witness on any other party’s witness list (regardless of whether the party removes that witness from its list), to call any witness necessary to authenticate documents (to the extent necessary), and to call any witness to provide rebuttal or impeachment testimony (as appropriate).

WITNESSES

Please take notice that Lavvan identifies the following witnesses it may call at the hearing to be held on October 4, 2023:

1. Any witness necessary to authenticate any exhibits.
2. Any witness necessary to provide rebuttal or impeachment.

¹ A complete list of each of the Debtors in these Chapter 11 Cases may be obtained on the website of the Debtors’ proposed claims and noticing agent at <https://cases.stretto.com/amyris>. The location of Debtor Amyris Inc.’s principal place of business and the Debtors’ service address in these Chapter 11 Cases is 5885 Hollis Street, Suite 100, Emeryville, CA 94608.

3. Any witness called by any other party participating in the October 4, 2023 hearing.
4. Michael Gaul, as rebuttal expert.

Lavvan reserves all rights, including the right to amend or supplement its witness list as needed and in accordance with the Local Rules, as well as its right to object to evidence or testimony offered by any party.

EXHIBITS²

Ex. No.	Description	Docket No. or Production No. (if available)
1.	Redacted version of that certain <i>Research, Collaboration and License Agreement</i> , dated as of March 18, 2019.	D.I. 171-A
2.	That certain <i>Security Agreement</i> , dated as of May 2, 2019.	D.I. 171-B
3.	That certain <i>UCC Financing Statement</i> , dated May 9, 2019.	D.I. 171-C
4.	That certain email sent by the International Chamber of Commerce International Court of Arbitration, dated August 11, 2023.	D.I. 171-D
5.	That certain <i>Subordination Agreement</i> , dated May 2, 2019.	D.I. 211-A
6.	That certain Form 10-K filed by Amyris, Inc., for the fiscal year ended December 31, 2020.	N/A
7.	That certain <i>Consent and Waiver</i> , dated May 2, 2019.	D.I. 402-A
8.	That certain <i>Model Form Intercreditor Agreement</i> prepared by the Intercreditor Agreement Task Force.	D.I. 402-B
9.	That certain <i>Amendment No 1 to Amended and Restated Loan and Security Agreement</i> , dated June 1, 2022.	D.I. 402-C
10.	That certain <i>Loan and Security Agreement</i> , dated June 29, 2018.	D.I. 402-D
11.	That certain <i>Amended and Restated Loan and Security Agreement</i> , dated October 28, 2019.	D.I. 402-E
12.	That certain <i>Loan Purchase Agreement</i> , dated April 15, 2019, by which the Foris Lenders acquired the LSA from GACP Finance Co., LLC.	AMYRIS-DIP002426
13.	That certain <i>UCC Financing Statement Amendment</i> , dated April 17, 2019.	AMYRIS-DIP002449

² Certain documents may be confidential and, if so, will be offered, if at all, under seal or in redacted form.

14.	That certain <i>UCC Financing Statement Amendment</i> , dated June 5, 2019.	AMYRIS-DIP002474
15.	That certain <i>Amendment No 5 to Loan Agreement and Waiver</i> , dated August 14, 2019.	AMYRIS-DIP002199
16.	That certain <i>UCC Financing Statement Amendment</i> , dated September 17, 2019.	AMYRIS-DIP002509
17.	That certain <i>Amendment No 6 to Loan Agreement</i> , dated October 10, 2019.	AMYRIS-DIP002220
18.	That certain <i>Amended and Restated Loan and Security Agreement</i> , dated October 28, 2019.	AMYRIS-DIP002232
19.	That certain <i>UCC Financing Statement Amendment</i> , dated November 21, 2019.	AMYRIS-DIP004011
20.	That certain <i>Warrant Exercise and Debt Equitization Agreement</i> , dated January 31, 2020.	AMYRIS-DIP002348
21.	That certain <i>UCC Financing Statement Amendment</i> , dated April 1, 2021.	AMYRIS-DIP002517
22.	That certain <i>Amendment to Amended and Restated Loan and Security Agreement</i> , dated November 9, 2021.	AMYRIS-DIP002593
23.	That certain <i>Amendment No 1 to Amended and Restated Loan and Security Agreement</i> , dated June 1, 2022.	AMYRIS-DIP002330
24.	That certain <i>Amendment to Amended and Restated Loan and Security Agreement</i> , dated June 30, 2022.	AMYRIS-DIP002341
25.	That certain <i>UCC Financing Statement Amendment</i> , dated December 13, 2022.	AMYRIS-DIP002519
26.	That certain <i>UCC Financing Statement Amendment</i> , dated May 25, 2023.	AMYRIS-DIP002523
27.	That certain Form 8-K filed by Amyris, Inc. on April 5, 2021.	N/A
28.	That certain Schedule 14(a) Proxy Statement filed by Amyris, Inc. on July 6, 2020.	N/A
29.	That certain <i>Expert Rebuttal Report of Michael Gaul, CTP, CFE</i> , dated September 26, 2023.	N/A
30.	That certain Form 8-K filed by Amyris, Inc. on September 4, 2019.	N/A
31.	That certain Form 8-K filed by Amyris, Inc. on August 20, 2019.	AMYRIS-DIP002949
32.	That certain <i>Accounting File Memorandum</i> , dated January 31, 2019.	AMYRIS-DIP003983
33.	Those certain <i>Minutes of a Regular Meeting of the Audit Committee of Amyris, Inc.</i> dated October 22, 2019.	AMYRIS-DIP000332
34.	That certain <i>Credit Agreement</i> , dated April 8, 2019.	AMYRIS-DIP002408
35.	That certain <i>Promissory Note</i> issued April 8, 2019.	AMYRIS-DIP002421
36.	That certain Form 8-K filed by Amyris, Inc. on April 11, 2019.	AMYRIS-DIP003936

37.	That certain Form 8-K filed by Amyris, Inc. on April 17, 2019.	AMYRIS-DIP003933
38.	That certain <i>Promissory Note</i> issued June 11, 2019.	AMYRIS-DIP002476
39.	That certain Form 8-K filed by Amyris, Inc. on June 17, 2019.	AMYRIS-DIP003941
40.	That certain Form 8-K filed by Amyris, Inc. on July 15, 2019.	AMYRIS-DIP003945
41.	That certain <i>Promissory Note</i> issued July 10, 2019.	AMYRIS-DIP002481
42.	That certain <i>Promissory Note</i> issued July 26, 2019.	AMYRIS-DIP002486
43.	That certain Form 8-K filed by Amyris, Inc. on August 1, 2019.	AMYRIS-DIP003949
44.	That certain Form 8-K filed by Amyris, Inc. on August 20, 2019.	AMYRIS-DIP002949
45.	That certain <i>Loan and Security Agreement</i> , dated June 29, 2018.	AMYRIS-DIP001997
46.	That certain Form 8-K filed by Amyris, Inc. on July 2, 2018.	AMYRIS-DIP002895
47.	That certain Form 8-K filed by Amyris, Inc. on April 10, 2019.	AMYRIS-DIP003930
48.	That certain <i>Credit Agreement</i> dated August 28, 2019.	AMYRIS-DIP002491
49.	That certain <i>Promissory Note</i> issued August 28, 2019.	AMYRIS-DIP002504
50.	That certain <i>Common Stock Purchase Warrant</i> issued October 11, 2019.	AMYRIS-DIP002850
51.	That certain Form 8-K filed by Amyris, Inc. on October 16, 2019.	AMYRIS-DIP003020
52.	That certain <i>Accounting File Memorandum</i> , dated November, 2019.	AMYRIS-DIP002809
53.	That certain Excel file titled <i>After Expensing Fees to Lenders</i> created on January 28, 2020.	AMYRIS-DIP002807
54.	That certain <i>Secured Term Promissory Note</i> , dated November 27, 2019.	AMYRIS-DIP002515
55.	That certain Form 8-K filed by Amyris, Inc. on December 2, 2019.	AMYRIS-DIP003168
56.	That certain <i>Common Stock Purchase Warrant</i> , issued on November 27, 2019.	AMYRIS-DIP002834
57.	That certain Form 8-K filed by Amyris, Inc. on February 6, 2020.	AMYRIS-DIP003172
58.	That certain <i>Accounting File Memorandum</i> , dated April, 2020.	AMYRIS-DIP003953

Dated: October 2, 2023
Wilmington, Delaware

Respectfully submitted,

/s/ Russell C. Silberglied

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